

November 22, 1993

Debbie Manzano Reports Analyst Reports Analysis Division Federal Election Commission Washington, D.C. 20463

Re: Human Rights Campaign Fund PAC C00235853
February through September Monthly Reports

Dear Ms. Manzano:

:0

٧Û

 ∞

M

 \circ

Thank you very much for your assistance to Eric Rosenthal of our organization in providing the information we need to answer your questions with respect to the above-captioned reports. Your questions fall into two categories - (1) whether we made excessive contributions to the Democratic Congressional Campaign Committee and (2) whether we have met the "best efforts" standard in identifying contributors of more than \$200 per year. Our response is as follows:

(1) The Human Rights Campaign Fund contributed \$15,000 to the Democratic Congressional Campaign Committee on February 17, 1993, the maximum we are permitted by law. We also made contributions totaling \$12,500 to the Democratic Special Election Fund, a joint fund raising committee of the Democratic Congressional Campaign Committee and the campaigns of now-Representatives Bennie Thompson (M-2), Peter Barca (WI-1) and Sam Farr (CA-17). We designated our contributions to the joint fund raising committee specifically to the following candidates in the following amounts:

4/5/93 - \$5,000 Bennie Thompson MS - 2 special runoff 4/12/93 - \$5,000 Peter Barca WI - 1 special runoff 4/12/93 - \$2,500 Sam Farr CA - 17 special runoff Ms. Debbie Manzano Federal Election Commission Page 2

I have prepared and am enclosing with this letter a modified copy of the Itemized Disbursements Schedule (line 23) which identifies the candidate to whom each of these three contributions ultimately went. Our contributions to each candidate, including any subsequent contributions, were within the prescribed limitations.

(2) Concerning our "best efforts" in asking for identifying information from our contributors in excess of \$200, as you suggested I have enclosed samples of the letters and enrollment forms we use to request such information. In the future, we will file copies of such materials at the start of each election cycle, as you have requested.

Finally, I want to assure you that we are aware of the new rules recently promulgated by the Commission concerning the *best efforts' standard in reporting contributions to the PAC aggregating in excess of \$200 per year. We are taking the necessary steps to implement the Commission's new requirements.

Thank you for your consideration. Please contact me if you need additional information.

Very truly yours,

Pinothy I. McFeeley

Treasurer

Enclosures Hand Delivered

W

M

· 🔼

S

ထ

M

:3

 \sim

n.

SCHEDULE B

ITEMIZED DISBURSEMENTS

| for each entegory of the | PAGE OF | _ |
|--------------------------|-----------------|---|
| | FOR LINE NUMBER | _ |

Any information copied from such Reports and Statements may not be sold or used by any perion for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to rollicit contributions from such committee. NAME OF COMMITTEE (in Full) Date Imanth Amount of Each Purpose of Disbursament A. Full Name, Mailing Addrsor and ZIP Code HD MS B2 Contribution Disbursament This Pariod day, year) Domocratic Special Westian Fund LBenny Thomason Disburgement for: | Primery 450 S. Copital Street General 04/15/13 5,000.00 MOTHER ISPOSITY) Special Election Washington, DC 20003 Purpose of Discursement
140 WI-91 Contribution Deta (manth Amount of Each B. Full Name, Melking Address and 21P Code Disburgament This Period day, year) Democratic Special Election Fund (Peter Boren) 40 Dece 4/5/93 430 S. Capital Street 5,000.00 Dispursement for: Primary X Other Ispective Special Gicchin Purpose of Disbursement Amount of Each C. Full Name, Mailing Address and ZIP Code Date Imanin. HO CA-17 CONTRIBATION day, vegr) Dispursement This Period Democratic Special Birchem Fund 40 DECK (Sam Fave) 415/13 400 5, Capital Street 5,000,00 Primary General Dippursement for: Washington, OC 20003 (Other (specify) 5 -C Lical Amount of Each D. Full Name, Mailing Address and ZIP Code Purpose of Disbursement Date (month, day, year) Disburgament This Period Primary General Disbursament for: Other Ispecify! Purpose of Disbursement Amount of Each Date (month, E. Full Name, Mailing Address and ZIF Code Disbursement This Period day, yeart S Distaursement for: Primary General Other Ispecify/ ∞ Amount of Each Date Imports. Purpose of Disburgament F. Full Name, Malling Address and ZIP Code day, yearl Disbursament This Period Disbursement for: Primary General Other Ispecify) Date Imanth. Amount of Each G. Full Name, MaiRng Address and ZIF Cods Purpose of Distoursement Disbursement This Period cptay,yeari Primary General Disbursement for: Other (specify) Oate (month, Amount of Each Purpose of Dispursement H. Full Name, Mailing Address and ZIP Code Distrursement This Pariod omy, yeari Primary General Disbursement for: Other (specify) Amount of Each (, Full Name, Melling Address and ZIP Code Purpose of Disburmment Date Imonin Disbursament This Percod day, year) Disbursament for Primary General Other Ispecify! TOTAL This Paried (last page this line number only)



FEDERAL CLUB CATEGORIES

YOUR GIFT IS NOT

0 i j

HUMAR RIGHTS CAMPAIGN FLND 1012 14/H STREET, NW. 6TH FLUDR WASHINGTON, DC 20005 202-62H-4160

MINTHILY P STALLANKFALLY & QUARTERLY HXP. DATE. I BUS, PHONE ļ ١ STATE J MASTERCARD J VINA A ASSUMBLY AUCOUNT NUMBER RY CREDIT CARD. PLEASE BILL ME: SIGNATURE .. SCULPATION ANOHA 539 PARTOLES ADDRESS NAME... (11)

FEDERAL CLUB UPDATE

With the new Development team in place and an expanded software on its way, we ask that you complete this form so we can better serve you, and also to ensure that our data is correct. Remember: if you have any questions, please contact your Federal Club Service Representative, Jillian Mackin at 202/628-4160. Thanks for your cooperation.

| VITAL STATISTICS (Who and where are you?) | |
|---|--|
| circle one: Mr. Ms. Dr. other full name | |
| preferred salutation (i.e., "Steve" rather than "Stephen"): | |
| home address: | - |
| city, state: | zip: |
| phone: birth date: | political effiliation: |
| employer or company name: | · - · - · - · |
| your job title: phos | ne: |
| work address: | |
| city, state: | zip: |
| your partner's (or lover's) full name: Mr. Ms. Dr. other_ | _ |
| his or her preferred first name: | |
| | |
| SOME PESKY QUESTIONS | |
| Do you want correspondence mailed to (circle one) Home | or Office ? |
| May we call you at work? Yes No | |
| Was your introduction to the Federal Club through a person | nal contact? Yes No |
| If yes, who was that person? where a | and when? |
| Was it a Federal Club party? Yes No Was it at HRCF he | adquarters in Washington? Yes No |
| If your partner is not listed currently on your Federal Club | membership, should they be? Yes No |
| As a Federal Club member, you are the heart and soul of the to recognize your contribution, but need your permission to member in our newsletter, in dinner programs, and in other organizations honor their major donors in this way, and it is Do we have your permission to list your name in our prints | publicly acknowledge you as a Federal Club r Campaign Fund publications. Most other may help us recruit more Federal Club members. |
| If yes, how would you like to be listed in printed materials? | |
| How would your partner like to be listed? | <u>. </u> |
| Are you interested in helping organize Federal Club activiti | ies in your city? Yes No |
| THE WORLD ACCORDING TO YOU What are the political issues that are most compelling to you more room!) | ou at this time? (Write on the back if you need |
| signature: | date: |

Federal Election Commission ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate

| | was received. | |
|-------|--|-----------------------|
| | Hand Delivered | 11/23/93 |
| | First Class Mail | POSTMARKED |
| | Registered/Certified Mail | POSTNAFIKED |
| | No Postmark | |
| | Postmark Illegible | |
| | Received from the House Office of Records and Registration | DATE OF RECEIPT |
| | Received from the Senate Office of Public Records | DATE OF RECEIPT |
| | Other (Specify): | POSTMARKED |
| | | andre DATE OF RECEIPT |
| | | |
| 5. | f | 11/23/93 |
| PREPA | REA | CATE PREPARED |